



I-84, Exit 211 360 S. 400 W. Heyburn, ID. 83336

1-208-679-6706

SALES – PARTS – SERVICES

www.schowsinc.net

JANUARY 24, 2018

TO: Stephen Healy / healy.stephen.epa.gov
EPA

This letter is to inform you that Schow's Inc. dba Schow's Truck and Equipment is in Compliance with Sections 40 cfr 1037.150 / 13 CFR 121.201 /NAICS code 336120

Schow's Inc. is owned by Steven Richard Schow, and Donald Willis Schow each owning %50 of Schow's Inc.

Schow's Inc. owns the following companies :

Schow's Inc. dba Nationalease of Utah dba Schow's Truck and Equipment
1269 Legacy View Street
Salt Lake City, UT. 84104

Western Idaho Freightliner
1214 Franklin Blvd.
Nampa, ID 83687

Schow's Truck and Equipment of Idaho Falls
6754 West Overland Drive
Idaho Falls, ID 83402

Schow's Truck and Equipment
360 S. 400 W.
Heyburn, ID. 83336

Schow's Inc. has, had the following number of Gliders built for the following years:

2010

2011

2012

2013

2014

Steven R. Schow/president

Donald W. Schow/vice-president

Schow's Inc. has, had the following number of Employees for the following years:

2015 - 121

2016 - 127

2017 - 134

Contact Information:

Jeff Pedersen, Sales Manager

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Don Schow

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Cell 208 431 9179

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Steve Schow

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Cell 208 431 3755

Fax 208 679 6186

emial jeff@schowsinc.net



Daimler Trucks North America LLC

August 9th, 2017**2018 WRITTEN REQUEST AND CERTIFICATION FOR PURCHASE OF GLIDER KIT**

To Whom It May Concern:

Daimler Trucks North America, LLC ("DTNA") may provide You with one or more uncertified incomplete vehicles ("glider kit" or "glider kits"). DTNA understands that You may install a remanufactured or used engine in the glider kit to produce a complete motor vehicle (a "glider vehicle"). Before DTNA may provide You with a glider kit, DTNA must obtain a signed statement from You that production of the glider vehicle complies with applicable regulations. DTNA therefore requests that You complete, sign, and return this letter indicating Your compliance with 40 C.F.R. § 1037.150(t)(1).

By signing and returning this letter, You represent the following to DTNA:

- (a) You have provided a written request for this glider kit to DTNA pursuant to 40 C.F.R. § 1037.622(b)(2).
- (b) You are a qualifying small business under the criteria specified in 13 C.F.R. § 121.201.
- (c) You have notified the United States Environmental Protection Agency (EPA)'s Designated Compliance Officer of Your exemption under 40 C.F.R. § 1037.150(c) before introducing excluded vehicles into commerce. This notification included (i) Your annual U.S.-directed production volumes, (ii) a description of Your qualification as a small business under 13 C.F.R. § 121.201, and (iii) an acknowledgement of Your intent to sell exempt vehicles under 40 C.F.R. § 1037.150(t)(1).
- (d) In calendar year 2014, You sold one or more glider vehicles as an exempt entity under 40 C.F.R. § 1037.150(e).
- (e) In calendar year 2018, You will not produce either (i) more than 300 glider vehicles or (ii) a number of glider vehicles exceeding Your highest annual production for any year from 2010 to 2014 (including 2010 and 2014).
- (f) You will not assemble the glider kit for your own operation and You will only use this glider kit in compliance with all provisions of 40 C.F.R. Part 1037, as well as any other applicable law or regulation.

As previously announced, any new DTNA Glider order received as of July 27, 2017 must meet the 2018 EPA requirements for assembly and will be scheduled no earlier than October 30, 2017. (see attached)

As a result, no additional orders will be accepted under the 2017 EPA requirements. This includes:

- No new orders for Powered Western Star or Freightliner gliders will be accepted.
- Only new orders for gliders, which will be assembled by an EPA qualified small business, will be accepted.
- All new orders must return a completed 2018 WRITTEN REQUEST FOR PURCHASE OF GLIDER KIT FORM.

Please see the attached notification sent on 08/09/17 announcing that DTNA will now begin to accept and schedule new glider orders under the 2018 EPA requirements for U.S. domicile assembled by qualified small businesses (dealers and glider assemblers) who sign and return the 2018 WRITTEN REQUEST FOR PURCHASE OF GLIDER KIT FORM

One of the new conditions for 2018 glider purchases requires the assembler of the glider kit to declare eligibility and provide notification to the EPA prior to introducing glider vehicles into commerce. DTNA's new 2018 WRITTEN REQUEST FOR PURCHASE OF GLIDER KIT FORM requires that the intended glider kit assembler complete this notification process with the EPA prior to any new orders being placed (see attached for detail)

Regards,

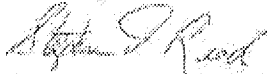
Matt Lyons | Glider Application Engineering – Western / Export Regions | Daimler Trucks North America | O: 803.578.3388 C: 803.439.5394

If you are not the addressee, please inform us immediately that you have received this e-mail by mistake, and delete it. We thank you for your support.

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Please understand that, pursuant to 40 C.F.R. § 1037.150(t)(1)(v)(B), this signed statement is deemed a submission to EPA. DTNA may be legally obligated to provide a copy of this signed letter to EPA.

Sincerely,



Daimler Trucks North America

ACCEPTED AND AGREED for Glider Kit Serial Number(s) K H 9396

DTNA Dealership:

Glider Kit Assembler

☐ Check box and leave blank if DTNA dealership will be performing the glider kit assembly

Schow's Inc
(Dealership Name)

(Company Name)

Don Schow
(Printed Name of Signee)

(Printed Name of Signee)

VP
(Title of Signee)

(Title of Signee)

[Signature]
(Signature)

(Signature)

11/2/18
(Date)

(Date)



August 9th, 2017

To: U.S. Dealers
Dealer Principals
New Truck Sales Managers
Parts Managers
All SpecPro Users

Subject: **DTNA Glider – Changeover to 2018 EPA Requirements for Sale of
Glider Kits for U.S. Domicile**

Commencement of new glider order intake under the 2018 EPA requirements:

DTNA will now begin to accept and schedule new glider orders under the 2018 EPA requirements for U.S. domicile assembled by qualified small businesses (dealers and glider assemblers) who sign and return the 2018 WRITTEN REQUEST FOR PURCHASE OF GLIDER KIT FORM (see attached). New glider orders received under this document will be scheduled for production no earlier than October 30th, 2017.

Consistent with our ongoing practice, all new orders received will be withheld from scheduling until the appropriately completed and signed 2018 WRITTEN REQUEST FOR PURCHASE OF GLIDER KIT FORM is received.

Please note that new orders scheduled for production between October 30th, 2017 and December 31st, 2017 will be built as MY2018 and subject to currently published SpecPRO pricing. Additional information regarding the MY2019 changeover date and associated pricing will be communicated in the coming weeks.

Notification of EPA Designated Compliance Officer:

One of the new conditions for 2018 glider purchases requires the assembler of the glider kit to declare eligibility and provide notification to the EPA prior to introducing glider vehicles into commerce. DTNA's new 2018 WRITTEN REQUEST FOR PURCHASE OF GLIDER KIT FORM requires that the intended glider kit assembler complete this notification process with the EPA prior to any new orders being placed.

DTNA dealerships who qualify for glider assembly in 2018 must provide notification to the EPA Designated Compliance Officer in the form of a letter containing the following information:

Visit our website: www.dtnaglider.com

- A statement that your company meets the small business criteria listed in 40 CFR 1037.150 (c) and the small business criteria specified in 13 CFR 121.201. (Assuming this is true.) Currently the size threshold for Heavy Duty Truck Manufacturers is 1500 employees – this is what is listed for NAICS Code 336120. The total number of employees includes that of the company and its affiliates (see 13 CFR 121 link below).
- A statement that your company is solely owned by (owner's name) and if there are multiple owners state each owner and the percentage ownership for each. Also describe any affiliations with other companies or state that there are no affiliations – assuming that is true.
- State the number of employees for each of the past 3 years.
- State the number of gliders that your company has built each year 2010 through 2014.
- Signed by the owner(s).
- Should be on company letterhead if possible.
- Include company address and contact information.

The notification letter must be signed and send in a PDF format to Stephen Healy, EPA OPAQ Compliance Division (healy.stephen@epa.gov)

For additional referenced, please see the below links to applicable regulations.

40 CFR 1037.150 - Interim Provisions – this covers the small business exclusion requirements (1037.150(c)) and the new interim glider requirements (1037.150(t)):

<http://www.ecfr.gov/cgi-bin/cfr/cfr?ap=8&SID=7b7047abdd965bd9a1b219b7b036fad98&mc=true&n=pt40.36.1037&r=PART&ty=HTML#se40.36.1037.118p>

40 CFR 1037.635 – Glider kits and glider vehicles:

<http://www.ecfr.gov/cgi-bin/cfr/cfr?ap=8&SID=7b7047abdd965bd9a1b219b7b036fad98&mc=true&n=pt40.36.1037&r=PART&ty=HTML#se40.36.1037.169p>

13 CFR Part 121 - Small business general provisions: describes how to determine affiliations and determine employee count:

<http://www.ecfr.gov/cgi-bin/text-id.x?SID=266ad73e48d34146461d9b3cc2a0d1ab&mc=true&n=pt13.1.121.a.sg0&rgn=div2>

Size standards for small business:

<http://www.ecfr.gov/cgi-bin/text-id.x?SID=266ad73e48d34146461d9b3cc2a0d1ab&mc=true&n=pt13.1.121.1201&rgn=div8>

Best Regards,

Kris Hus
Manager – Glider Field Sales
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Visit our website: www.dtnaglider.com